

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CR. NO. 21-20415

v.

HON. GERSHWIN A. DRAIN

JESSIE WALKER, III,

Defendant.

**REPLY TO GOVERNMENT’S RESPONSE TO MOTION FOR
REVOCATION OF DETENTION ORDER
AND FOR RELEASE ON BOND**

In this case, there are conditions that can reasonably assure the safety of the community and Mr. Walker’s appearance at future court dates. The government’s concern about instability in Mr. Walker’s living situation is no longer appropriate. Counsel has proposed a stable, viable solution. Placing Mr. Walker at a halfway house would provide him with a stable and safe place to live. It would provide him with supervision and a level of security that can reasonably assure the safety of others. Most importantly, it will afford Mr. Walker the opportunity to get mental health treatment. Mr. Walker’s mental health lies at the heart of this case, and the government’s position that he should continue to be detained pending trial ignores the reality that he needs services that he does not have access to while detained.

There is no reason to think Mr. Walker could not comply with the requirements of a tether or the halfway house. The government's assertion that these conditions "require an amount of accountability and responsibility that is lacking in Mr. Walker" is a speculation that simply has no basis in fact. (Gov. Response, ECF No. 20, PageID.95.) Mr. Walker has not yet had the opportunity to demonstrate his ability to comply with bond conditions while getting the mental health treatment he needs. Once given the opportunity to access the mental health services he needs, there will be no reason to believe that Mr. Walker will pose a risk of flight, dangerousness, or noncompliance with any conditions of release imposed by the court.

Mr. Walker maintains that this Court should grant him bond with standard conditions or alternatively, with the condition that he be released to a halfway house, so that he may start receiving mental health treatment through Team Wellness.

Respectfully Submitted,

FEDERAL COMMUNITY DEFENDER

/s/Casey Swanson
613 Abbott Street, 5th Floor
Detroit, Michigan 48226
(313)463-6144
e-mail: casey_swanson@fd.org
P79941

Date: August 12, 2021